

MorrisonCohen LLP

Fred H. Perkins
Partner
(212) 735-8647
fhperkins@morrisoncohen.com

November 26, 2024

VIA ECF

Hon. Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Dumbo Moving & Storage, Inc. v. Piece of Cake Moving & Storage LLC et al.
1:22-cv-05138 (ER)

Dear Judge Ramos:

This firm is counsel to all Defendants, except Volodymyr Plokhykh, in the above-referenced action. We write to request an adjournment of the scheduled case management conference. The current date for the case management conference is December 5, 2024 at 11:00 a.m. The new proposed date for the case management conference is December 12, 2024 or, alternatively, such later date convenient to the Court and the parties following the disposition of Defendants' pending motion to compel and related relief. This is the first request for adjournment of this case management conference. All counsel consent to this request. This adjournment request is necessitated by the fact that the undersigned counsel will be traveling out of the state on the scheduled date. The adjournment of this conference does not affect any other scheduled date.

Thank you.

Respectfully submitted,

Fred H. Perkins

Fred H. Perkins

FHP:gg

cc: All counsel (via ECF)